

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Jamil Deon BRIGGS

Case No. Case: 2:20-mj-30342  
Assigned To : Unassigned  
Assign. Date : 8/28/2020  
USA V. SEALED MATTER (CMP)(CMC)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 12, 2020 in the county of Macomb in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1073	18 U.S.C. § 1073 - Interstate flight to avoid prosecution -

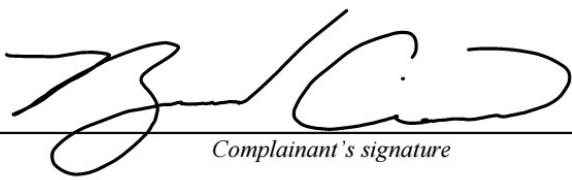
This criminal complaint is based on these facts:

Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 28, 2020

City and state: Detroit, Michigan

  
Complainant's signature

Special Agent Bradley Cioma, F.B.I.  
Printed name and title

  
Judge's signature

Hon. R. Steven Whalen, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF  
A COMPLAINT AND ARREST WARRANT**

I, Bradley Cioma, being sworn, depose and state the following:

**I. INTRODUCTION & AGENT BACKGROUND**

1. I have been employed as a Special Agent with the FBI since May of 2017. I am currently assigned to the FBI Detroit Division's Violent Crime Task Force (VCTF). As a federal agent, I am authorized to investigate violations of laws of the United States and execute warrants issued under the authority of the United States.

2. This affidavit is in support of a complaint and arrest warrant for Jamil Deon BRIGGS, date of birth XX/XX/1995. This affidavit is submitted for the limited purpose of establishing probable cause and does not include all of the information known to law enforcement related to this investigation.

3. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, law enforcement reports that I have reviewed, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

4. BRIGGS currently has two felony warrants out of the state of Michigan. One for a probation violation and one for an armed robbery which took place on/about January 24, 2020. Probable cause exists that BRIGGS traveled from Michigan to another state with the intent to avoid prosecution for both the armed robbery, in violation of 18 U.S.C. § 1073 (interstate flight to avoid prosecution).

## **II. PROBABLE CAUSE**

5. On January 24, 2020, an armed robbery took place inside a gas station located in Detroit, Eastern District of Michigan. During the robbery, Defendant 1, a male, observed a firearm in the victim's front pocket. When the victim turned around, Defendant 1 attempted to reach into the victim's pocket and steal the firearm. A fight ensued. As the two individuals wrestled for the firearm, Defendant 2, who was also inside the gas station, pulled a gun from his waistband and pointed it at the victim's head. The victim was forced to surrender his firearm to Defendant 1. Defendant 1 and 2 fled the store together, entered separate vehicles that were parked outside the gas station, and left the location.

6. The Detroit Police Department conducted a media release and received two phone calls identifying Jacquez Wincher as Defendant 1. The victim picked out Wincher, in a photo line-up, as the subject who was fighting with him for the gun.

7. The victim advised the Detroit Police Department that a friend told him that Defendant 2 had a Facebook profile with the name “Richbums”. The Detroit Police Department then completed a workup on “Richbums” and identified Defendant 2 as BRIGGS. The Detroit Police then conducted another photo lineup which included BRIGGS. The victim picked out BRIGGS as Defendant 2, the individual who pointed the gun at his head. The surveillance from inside the gas station further confirmed that BRIGGS was Defendant 2.

8. On March 12, 2020, a felony arrest warrant was issued for BRIGGS for armed robbery. The Detroit Police Department attempted to locate BRIGGS by pinging his known cellular phone number but the phone number was turned off.

9. On July 31, 2020, the Detroit Police Department utilized law enforcement resources to identify a new phone number for BRIGGS.

The Detroit Police Department then swore out a cell phone ping warrant and tracked the phone's location.

10. The ping warrant showed BRIGGS's cellular phone was located at an apartment complex located at xxxx5 Saravilla Dr., Clinton Township, Michigan. The Detroit Police Department then reviewed camera footage for the common area of the apartment complex. BRIGGS was observed on the property entering apartment number 7. The cellular phone pinged inside that location at the same time. The phone pings were monitored for a period of time and showed the phone returning to that location every night.

11. The Detroit Police Department obtained and executed a search warrant for the residence. Neither BRIGGS nor the cellular phone were inside the apartment. The cell phone pings were showing the location of the cellular phone every fifteen minutes. Prior to the execution of the search warrant, the pings put the phone inside the apartment. After the search warrant was executed, the next ping showed the cell phone traveling towards Detroit.

12. The cellular phone ping warrant later expired and the police continued monitoring BRIGGS's Facebook page in attempt to locate

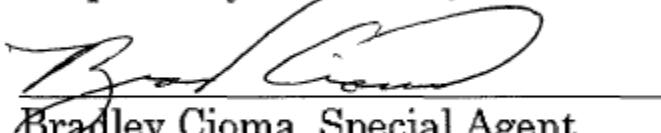
him. The Facebook page showed a post the day after the execution of the aforementioned search warrant. In a video post, BRIGGS said “I don’t know how they found me,” “Chanelle I catch up with you,” and “We are about to go to Miami.” There were other posts made by BRIGGS referencing that he was traveling to Miami. One of the posts showed photographs of BRIGGS near a vehicle with a Florida license plate in the background.

13. The Detroit Police Department ran the license plate and it came back to a Hertz Rental Car out of Florida. The Facebook page also showed recent posts of photographs of BRIGGS with palm trees on the side of the road and around homes.

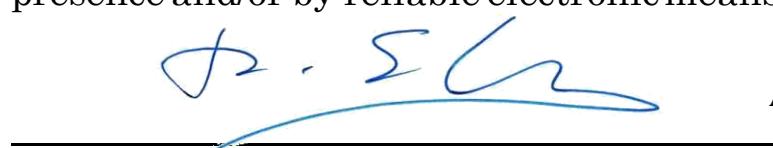
### III. CONCLUSION

14. Probable cause exists that Jamil Deon BRIGGS did move and travel in interstate and foreign commerce with intent to avoid prosecution and/or imprisonment for armed robbery, a felony under the laws of the state of Michigan, in violation of 18 U.S.C. § 1073, (interstate flight to avoid prosecution).

Respectfully submitted,

  
\_\_\_\_\_  
Bradley Cioma, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means.

  
\_\_\_\_\_  
August 28, 2020

HONORABLE R. STEVEN WHALEN  
UNITED STATES MAGISTRATE JUDGE